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January 14, 2021

## **VIA ECF AND EMAIL**

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Honorable Richard J. Sullivan  
United States Circuit Judge  
United States Court of Appeals for the Second Circuit  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Room 2530  
New York, New York 10007

**Re: *In re: Application of Gorsoan Limited, et al.*  
(Case No. 17-cv-5912)**

Dear Judge Sullivan:

On behalf of Petitioners Gorsoan Limited and Gazprombank OJS (together, "Gorsoan"), we respectfully submit this letter with respect to Your Honor's Order dated January 12, 2021, filed January 13, 2021, concerning the December 23, 2020 letter (the "Bullock Letter") of Respondent Janna Bullock ("Bullock" or "Respondent").

The Bullock Letter was submitted with respect to Respondent's production of documents that same day, pursuant to the Court's Order dated November 23, 2020, and the status of outstanding bank and foreign language records. Bullock noted that she continued to await receipt of JP Morgan Chase (JPMC) and Citibank records and committed to producing responsive records upon their receipt and review. Bullock Letter at 1-2. Bullock also alerted the Court that her review of foreign language records was incomplete and additional time was required to consider their responsiveness. Bullock Letter at 2. In addition, Respondent opined that "there may also be significant legal issues that require briefing" as to whether responsive documents are subject to Section 1782 discovery. Bullock Letter at 2. As a result, Respondent "respectfully request[ed] more time to consider this one group of documents and to brief any issues as appropriate...." *Id.* at 3. Respondent proposed to the Court that she submit her brief on the matter by January 15, 2021[1]. *Id.*

Counsel for Petitioners read and understood the Bullock Letter, in significant part, to constitute an application to the Court for a briefing schedule. In the meantime, counsel undertook and completed a review of the Bullock December 23rd production. Earlier this week, counsel directly presented Bullock counsel with a list of issues regarding the production, without seeking to

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burden the Court. *See* Exhibit A. Among other issues, counsel inquired about the status of the bank record production (including the outstanding JPMC and Citibank records), legal and factual issues with respect to the foreign language documents under review and Bullock's expected discovery completion date. *Id.* Last night, Bullock counsel advised that it was then producing both Citibank records and substitute images in response to a request for clear, readable pages of 21 documents. JPMC records remain outstanding, and the other legal and factual issues have not yet been addressed.

Under the circumstances, Gorsoan respectfully requests that Bullock be afforded a reasonable opportunity to consider and respond to the remaining inquiries in Exhibit A, including those concerning foreign language documents and the date by which Respondent's discovery production will be completed. Counsel is hopeful that the parties can work through the issues that have been identified. However, in the event that the parties are unable to resolve any remaining issues quickly, it is requested that they report the issues and propose a briefing schedule to the Court by January 22, 2021, and that Bullock's deposition be deferred until 30 days from completion of her discovery production, or at least 30 days from yesterday's production, in accordance with the Court's November 23rd Order.

Respectfully submitted,

/s/ Jonathan N. Halpern

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*Counsel for Petitioners Gorsoan Limited and Gazprombank  
SJC*

cc: ECF Counsel (via ECF)

Petitioners' request is GRANTED. Accordingly, IT IS HEREBY ORDERED THAT the deadline for Janna Bullock's deposition is adjourned, and the parties shall file a joint letter no later than January 22, 2021, identifying any remaining disputes about Bullock's compliance with her production obligations.

**SO ORDERED:**

**Dated:** 01/14/2021

  
**RICHARD J. SULLIVAN**  
U.S.C.J., Sitting by Designation